STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS BUREAU OF PROFESSIONAL LICENSING BOARD OF ATHLETIC TRAINERS DISCIPLINARY SUBCOMMITTEE

In the Matter of

DESTINY CHANTELLE TEACHNOR-HAUK,	A.T.		
License No. 26-01-000248	-	Complaint No.	26-18-149885

ADMINISTRATIVE COMPLAINT

Attorney General Dana Nessel, through Assistant Attorney General Bridget K. Smith, on behalf of the Department of Licensing & Regulatory Affairs, Bureau of Professional Licensing (Complainant), files this complaint against Destiny Chantelle Teachnor-Hauk, A.T. (Respondent), alleging upon information and belief as follows:

- 1. The Board of Athletic Trainers, an administrative agency established by the Public Health Code, 1978 PA 368, as amended, MCL 333.1101 et seq, is empowered to discipline licensees under the Code through its Disciplinary Subcommittee (DSC).
- Respondent has been licensed to practice as an athletic trainer since
 pursuant to the Public Health Code. At all times relevant to this complaint,
 Respondent worked as an athletic trainer at Michigan State University.
- 3. Section 16221(b)(vi) of the Code provides the DSC with authority to take disciplinary action against a licensee for lack of good moral character, defined in section 1 of 1974 PA 381, as amended; MCL 338.41 et seq, as the "propensity on

the part of the person to serve the public in the licensed area in a fair, honest, and open manner."

4. Section 16226 of the Code authorizes the DSC to impose sanctions against persons licensed by the Board if, after opportunity for a hearing, the DSC determines that a licensee violated one or more of the subdivisions contained in section 16221 of the Code.

FACTUAL ALLEGATIONS

- 5. Respondent has been an athletic trainer at MSU since 1998. During that time, Larry Nassar was a licensed doctor of osteopathic medicine at MSU's Sports Medicine Clinic. In her role, Respondent worked with Nassar on a professional level, often providing athletic training services to athletes under Nassar's medical care. In 2018, the Board of Osteopathic Medicine and Surgery's DSC permanently revoked Nassar's osteopathic license based, in part, on his criminal sexual conduct convictions involving conduct with MSU student athletes during medical appointments.
- 6. Student-1, an MSU female athlete, saw Nassar for treatment of a sports-related injury in 1999 and 2000. On multiple occasions, Nassar penetrated Student-1's vagina with an ungloved finger under the guise of medical treatment.
- 7. During that time, Student-1 told athletic trainers about Nassar's conduct, including Respondent.
- 8. Specifically, in the fall of 2000, Student-1 advised Respondent that
 Nassar was performing treatments that included vaginal penetration and it made

her uncomfortable. According to the student, Respondent advised her that this was a legitimate medical procedure and she should not worry.

- 9. On June 11, 2018, Respondent was interviewed by Department of Attorney General Special Agents as part of the investigation into Nassar's conduct at MSU. During that interview, Respondent was advised that the interview was part of a police investigation.
- 10. During her interview, Respondent denied that Student-1 or any other student athlete had ever advised her of concerns with Nassar or his treatment. She also denied any knowledge that Nassar may have been performing inter-vaginal procedures during that time.
- 11. Based on the information obtained throughout the investigation,
 Respondent's statements to the investigators on June 11, 2018 were untruthful.

COUNT I

12. Respondent's conduct as described in paragraphs 9-11 regarding false statements to investigators, evidence a lack of good moral character, in violation of section 16221(b)(vi) of the Code.

THEREFORE, Complainant requests that this Complaint be served upon
Respondent and that Respondent be offered an opportunity to show compliance with
all lawful requirements for retention of the aforesaid license. If compliance is not
shown, Complainant further requests that formal proceedings be commenced
pursuant to the Public Health Code, rules promulgated pursuant to it, and the

Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCL 24.201 et seq.

RESPONDENT IS HEREBY NOTIFIED that, pursuant to section 16231(8) of the Public Health Code, Respondent has 30 days from receipt of this complaint to submit a written response to the allegations contained in it. Pursuant to section 16192(2) of the Code, Respondent is deemed to be in receipt of the complaint 3 days after the date of mailing listed in the attached proof of service. The written response shall be submitted to the Bureau of Professional Licensing, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, Michigan, 48909, with a copy to the undersigned assistant attorney general. Further, pursuant to section 16231(9) of the Code, failure to submit a written response within the 30 day-period shall be treated as an admission of the allegations contained in the complaint and shall result in transmittal of the complaint directly to the Board's Disciplinary Subcommittee for imposition of an appropriate sanction.

Respectfully submitted,

DANA NESSEL Attorney General

Bridget K. Smith (P71318) Assistant Attorney General

Licensing & Regulation Division

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Dated: February 19, 2019

LF: 2018-0223495-A/Teachnor-Hauk, Destiny Chantelle, A.T. 149885/Complaint - Administrative Complaint - 2018-02-19